

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF OKLAHOMA

BRUCE JACKSON,)	
)	
Plaintiff,)	
)	
vs.)	15-CV-27-RAW
)	
BOARD OF THE COUNTY)	
COMMISSIONERS OF BRYAN COUNTY,)	
OKLAHOMA, and)	
)	
SHERIFF KEN GOLDEN)	
Defendants.)	

COMPLAINT

COMES NOW, the Plaintiff herein by and through his attorneys of record James Patrick Hunt and Gary Eaton and files this original complaint, stating claims for relief as follows.

I. JURISDICTION AND VENUE

1. This is an action arising under the laws of the United States of America, in particular Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. Sec. 2000e-16, and the Civil Rights Act of 1991, 42 U.S.C. sec. 1981a.
2. The jurisdiction of this court is invoked pursuant to the provisions of Title VII, 42 U.S.C. sec. 2000(e)-5 and 2000e – 16(c), and the general civil rights jurisdictional provisions of 28 U.S.C. sec. 1343(a)(4).
3. This is an employment discrimination and retaliation case by a former employee of the Bryan County Sheriff's Office, State of Oklahoma alleging a continuing series of sexual harassment against him and retaliation because of having complained about unlawful same.

4. The Defendants are the Board of Commissioners of Bryan County and Sheriff Ken Golden.

5. Plaintiff seeks a declaration that Defendants intentionally and unlawfully engaged in sexual harassment and retaliated against him for opposing such conduct, appropriate injunctive relief, lost pay, compensatory and punitive damages.

II. STATEMENT OF FACTS

6. Plaintiff Bruce Jackson was employed as a jailer by the Bryan County Sheriff's Office from November 19, 2012 until his termination in June of 2014.

7. At the time of the sexual harassment, Plaintiff worked under the supervision of Captain Jamie Newberry. Ms. Newberry was the chief administrator of the Bryan County jail.

8. Plaintiff worked under the supervision of Chief Warrant Officer Lisa Miller. Lisa Miller and Jaime Newberry started working together at the Bryan County jail at the same time. It is Plaintiff's understanding that Ms. Miller and Ms. Newberry had previously worked together prior to working at Bryan County jail. Plaintiff was told that Ms. Newberry and Ms. Miller came to Bryan County as a "package deal."

9. The Sheriff of Bryan County during this time was Ken Golden.

10. Shortly after Ms. Miller began working at the county jail, she touched Plaintiff's buttocks in the workplace. Ms. Miller also hugged Plaintiff in front of inmates in the jail. Plaintiff asked her to stop and she told him to, "Lighten up." Several times, Ms. Miller called Plaintiff "honey" and "baby". Plaintiff told Ms. Miller he was a married man and he did not appreciate her treatment of him. Ms. Miller continued to humiliate Plaintiff at the workplace

11. Plaintiff reported this unwanted physical conduct to Captain Newberry through his chain of command.

12. Because Captain Newberry took no action to correct the situation or to admonish Ms. Miller, Plaintiff filed a complaint of sexual harassment with the Equal Employment Opportunity Commission (EEOC) on or about May 2, 2014.

13. After Plaintiff filed this complaint, the Bryan County Sheriff's Office conducted an internal investigation. Pursuant to this investigation, Plaintiff was questioned by Aubrey Stanfield, an investigator the Bryan County Sheriff's Office.

14. After the investigation was conducted, Ms. Miller's employment with the Bryan County Sheriff's Office ended. Plaintiff does not know at this time if Ms. Miller was terminated or asked to resign or resigned of her own accord.

15. After the investigation concluded, Bryan County Sheriff Ken Golden terminated Plaintiff on or about June 3, 2014. Sheriff Golden told Plaintiff he was terminated for "being a disruptive force."

16. On or about June 17, 2014, Plaintiff filed a second complaint with Equal Employment Opportunity Commission (EEOC) asserting retaliation. The EEOC issued a Notice of Suit Rights – Right to Sue letter on November 3, 2014.

FIRST CAUSE OF ACTION

SEXUAL HARASSMENT

17. Plaintiff readopts and re-alleges each and every allegation contained in paragraphs 1 through 16 as if set forth herein.

18. Defendants discriminated against Plaintiff and sexually harassed him in violation of Title VII of the Civil Rights Act of 1964, as amended by the Civil Rights Act of 1991.

SECOND CAUSE OF ACTION

RETALIATION

19. Plaintiff readopts and re-alleges each and every allegation contained in paragraphs 1 through 18 as if set forth therein.

20. Defendants retaliated against Plaintiff when he complained about sexual harassment in the workplace. This by itself was a violation of Title VII of the Civil Rights Act of 1964, as amended by the Civil Rights Act of 1991

PRAYER FOR RELIEF

Plaintiff has suffered financial losses, humiliation, embarrassment, emotional pain, mental anguish, injury to his good name, and personal and professional reputation as a result of the Defendants' illegal conduct. Plaintiff prays for relief requiring Defendants to compensate him for the damages he has suffered as a result of their illegal and tortuous conduct. Plaintiff prays for actual, compensatory, and punitive damages against the Defendants.

WHEREFORE, Plaintiff Bruce Jackson prays for judgment on the foregoing claims and for all sums due with pre and post judgment interest hereon, all costs and attorney fees associated with this matter, to and including actual, compensatory and punitive damages against Defendants Bryan County Board of Commissioners and Sheriff Ken Golden.

Respectfully submitted,

_____/s/ James P. Hunt_____
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**JURY TRIAL DEMANDED
ATTORNEY'S LIEN CLAIMED**